

EXHIBIT 7

Public - Redacted

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, JULIEANNA
MUNIZ, ELIZA CAMBAY, SAL CATALDO,
EMIR GOENAGA, JULIAN SANTIAGO,
HAROLD NYANJOM, KELLIE NYANJOM
and SUSAN LYNN HARVEY individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-cv-04688-RS

**PLAINTIFFS' REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
DEFENDANT GOOGLE LLC,
SET EIGHT**

- G [REDACTED] Dashboard, which shows statistics about “WAA on vs off.” GOOG-RDGZ-00045452 at -53.
- DASNav, which “automatically provided ‘All WAA Logging.’” GOOG-RDGZ-00045452 at -54.
- Sessions, which has a “field” that is “is_waa_off.” GOOG-RDGZ-00045452 at -56.
- go/dasle, which tracks “behavior for signed-in users with Web & App Activity setting off.” GOOG-RDGZ-00042692 at -92.
- Any dashboard used to generate the statistics showed in GOOG-RDGZ-00046873 at -75, where Google notes a “[REDACTED] QPD increase in WAA off queries” and shows a chart logging “daily events” where WAA is off.
- The “Magic Eye Activity” tables where Google tracks information for “signed-in WAA-off users,” including “revenue tables” and the e.Gwslog [REDACTED], GOOG-RDGZ-00042769 and -70.

REQUEST FOR PRODUCTION NO. 256:

Please produce DOCUMENTS sufficient to determine:

- a) The number of unique GOOGLE Accounts for which the user disabled (i.e., turned “off”) WAA or sWAA at least once during the class period.
- b) The number of unique GOOGLE Accounts (i) for which the user disabled (i.e., turned “off”) WAA or sWAA at least once during the class period, AND (ii) the geographical and/or geolocation data, associated with the Account, indicate that the user resided in the United States during any part of the Class Period.
- c) The number of unique GOOGLE Accounts (i) for which the user disabled (i.e., turned “off”) WAA or sWAA at least once during the class period, AND (ii) the

geographical and/or geolocation data, associated with the Account, indicate that the user resided in California during any part of the Class Period.

REQUEST FOR PRODUCTION NO. 257:

Please produce DOCUMENTS sufficient to determine the revenue and profits that GOOGLE receives related to the collection, storage, or use of WAA OFF DATA, including:

- a. The amount of those revenue and profits by year and month, including revenue and profits for conversion tracking or modeling and personalized advertisements;
- b. How those revenue and profits are and have been generated;
- c. How those revenue and profits are and have been accounted for within the profit and costs centers of GOOGLE, including for specific GOOGLE products, services, teams, and accounting units; and
- d. The amount of those revenue and profits attributed to the profit and costs centers of GOOGLE, including for specific GOOGLE products, services, teams, and accounting units, described by year and month.
- e. The amount of those revenue and profits specific to both the United States and California.

This Request includes DOCUMENTS sufficient to identify any GOOGLE dashboard that tracks those revenue and profits, including screenshots to show how any such dashboard can be queried.

REQUEST FOR PRODUCTION NO. 258:

Please produce all DOCUMENTS relating to any efforts by GOOGLE to study, analyze, or quantify the financial impact to GOOGLE of any GOOGLE feature that limited or stopped GOOGLE from collecting, saving, or using information from USERS' activity on non-GOOGLE websites or apps.

REQUEST FOR PRODUCTION NO. 259:

Please produce all DOCUMENTS relating to any efforts by GOOGLE to study, analyze, or quantify the financial benefit to GOOGLE from collecting, saving, or using information from

REQUEST FOR PRODUCTION NO. 272:

Please produce all DOCUMENTS regarding GOOGLE studies, including user and device studies, regarding how the data collection process with Firebase and Google Mobile Service affects the hardware and battery performance and life of mobile devices.

REQUEST FOR PRODUCTION NO. 273:

Please produce all DOCUMENTS regarding GOOGLE broadband and mobile phone services charges for cellular data usage, including any documentation of GOOGLE'S market rates, and internal GOOGLE analysis, research, or studies regarding prices charged by competitors.

Respectfully submitted,

Dated: May 27, 2022

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